

# Con Foster Collection Strategic Plan for NAGPRA Compliance

Prepared for the City of Traverse City

By Bernstein & Associates, LLC  
Native American Graves Protection and Repatriation Act Consultants  
1041 Lafayette Street  
Denver, CO 80218  
303-894-0648  
[www.NAGPRA.info](http://www.NAGPRA.info)

<b>ABBREVIATIONS</b>	<b>4</b>
<b>STRATEGIC PLAN USER'S GUIDE</b>	<b>5</b>
INTRODUCTION	5
THIS DOCUMENT	5
EXCEL WORKBOOK	6
<b>LEGAL REQUIREMENTS</b>	<b>8</b>
OVERVIEW OF THE ACT	8
HUMAN REMAINS AND ASSOCIATED FUNERARY OBJECTS	9
SECTION 5 (25 U.S.C. 3003) & 43 CFR 10.9 - INVENTORIES AND NOTICES OF INVENTORY COMPLETION	9
43 CFR 10.11 - CULTURALLY UNIDENTIFIABLE HUMAN REMAINS AND ASSOCIATED FUNERARY OBJECTS	11
SACRED OBJECTS, OBJECTS OF CULTURAL PATRIMONY, AND UNASSOCIATED FUNERARY OBJECTS	12
SECTION 6 (25 U.S.C. 3004) & 43 CFR 10.8 – SUMMARIES	12
FUTURE APPLICABILITY RULE (43 CFR 10.13)	14
NEW INDIAN TRIBE	14
NEW HOLDING	14
AMENDMENT OF PREVIOUS DECISION	14
REPATRIATION/DISPOSITION (TRANSFER OF CONTROL) - NAGPRA SECTION 7 (25 U.S.C. 3005) & 43 CFR 10.10	15
REPATRIATION/DISPOSITION (TRANSFER OF CONTROL) – PROCESS	16
<b>COMPLIANCE TIMELINE</b>	<b>17</b>
SIX-YEAR STRATEGIC PLAN GOAL FOR FULL NAGPRA COMPLIANCE*	17
NATIVE AMERICAN HUMAN REMAINS	17
CULTURAL ITEMS THAT MAY BE SACRED OBJECTS, OBJECTS OF CULTURAL PATRIMONY, OR UNASSOCIATED FUNERARY OBJECTS	17
FY 2016	17
FY 2017	17
FY 2018	17
FY 2019	17
FIGURE 1 - COMPLIANCE TIMELINE FOR HUMAN REMAINS	19
FIGURE 2 - COMPLIANCE TIMELINE FOR SACRED OBJECTS, OBJECTS OF CULTURAL PATRIMONY, AND UNASSOCIATED FUNERARY OBJECTS	20
<b>ADDITIONAL ACTIVITIES</b>	<b>21</b>
<b>CONSULTATION RECOMMENDATIONS</b>	<b>21</b>
<b>COMPLIANCE FUNDING</b>	<b>22</b>
<b>MORE ABOUT FUNDING COMPLIANCE WITH NAGPRA GRANTS</b>	<b>22</b>
TYPES OF GRANTS	22
GRANT PERIOD (TIMELINE)	22
GRANT BUDGETS	22
EXTENSIONS & MODIFICATIONS	23
<b>STAFFING NEEDS FOR EACH GRANT-FUNDED PROJECT</b>	<b>24</b>
<b>APPENDICES</b>	<b>25</b>

<b>APPENDIX 1 – HISTORY OF COMPLIANCE</b>	<b>26</b>
<b>APPENDIX 2 – FILING GUIDE AND FINDING AID</b>	<b>27</b>
<b>APPENDIX 3 – EXECUTIVE SUMMARY</b>	<b>39</b>
<b>APPENDIX 4 – 43 CFR 10.11 COMPLIANCE RESOURCES</b>	<b>41</b>
<b>APPENDIX 5 - ADDITIONAL RESOURCES</b>	<b>42</b>

## Abbreviations

AFO.....	Associated funerary object(s)
B&A.....	Bernstein & Associates
CFR .....	Code of Federal Regulations
FTE .....	Full time equivalent
MNI.....	Minimum number of individuals
NAGPRA .....	Native American Graves Protection and Repatriation Act
NAGPR .....	Native American Graves Protection and Repatriation (Review Committee)
NIC.....	Notice of inventory completion
NIR.....	Notice of intent to repatriate
NPS .....	National Park Service
UFO.....	Unassociated funerary object(s)
USC.....	United States Code

## Strategic Plan User's Guide

### Introduction

Bernstein & Associates prepared this Native American Graves Protection and Repatriation Act (NAGPRA) Compliance Strategic Plan at the request of the City of Traverse City, which has in its possession and control the Con Foster Collection. The collection includes Native American cultural items at least some of which are covered by NAGPRA.

In addition to this document, the Strategic Plan is also comprised of an Excel workbook. The two documents are designed to complement each other, and both should be consulted throughout implementation.

### This Document

This document is divided into sections that in part mirror the Act (25 USC 3001 et seq.) and the implementing regulations (43 CFR 10). Examples of this are:

- Section 5 - Human remains and associated funerary objects;
- Section 6 - Sacred objects, objects of cultural patrimony, and unassociated funerary objects; and
- Section 7 – Repatriation.

Each of the above-mentioned sections contains the following subsections:

- Legal requirements of the Act (25 U.S.C. 3001 et seq.) and regulations (43 CFR 10);
- Current status of each of the legal requirement;
- Requirements and recommendations to comply with the legal requirements and maintain intellectual control; and
- Related Excel worksheet(s).

## Excel Workbook

### CON FOSTER - NAGPRA COMPLIANCE STRATEGIC PLAN.XLSX

The Excel workbook consists of multiple of worksheets. Some serve as references and others as compliance tracking tools, which require updating.

## Worksheets

### GRANT TRACKING TOOL

This worksheet provides an overview of NAGPRA Consultation/Documentation and Repatriation grants. It should be updated annually or as new grants are applied for and awarded.

### TIMELINE

This worksheet lists Strategic Plan implementation activities along with their start and end dates. It also includes a chart. *The chart and the data are linked. Any changes to the data will be reflected in this chart as well as the charts in this document (figures 1 and 2).*

### B&A NOTES ON PORTION OF COLL

This worksheet contains a portion of the data exported from the Con Foster Collection PastPerfect collection management database. It is to be used in the preparation of the NAGPRA Section 6 Summary. The Excel file that contains the export from the database is **PPSDATA.XLSX**

### NIR PUBLICATION TRACKING TOOL

This worksheet should be used to track publication of notices of intent to repatriate (NIR) in compliance with Section 6 of NAGPRA (**sacred objects and objects of cultural patrimony, and unassociated funerary objects**). These notices are published after a claim is received and determined to be valid.

### NIC PUBLICATION TRACKING TOOL

This worksheet should be used to record publication of notices of inventory completion, notice publication announcements, transfers of control, transfers of custody, and other compliance and post-compliance-related (physical transfer) activities associated with **human remains and associated funerary objects**.

### CULTURALLY UNIDENTIFIABLE INV

The human remains, if they are present, will be included in a culturally unidentifiable human remains inventory that will be submitted to the National NAGPRA Program. They are also listed here for reference.

### CUI ABORIGINAL LAND RESEARCH

Under the CUI Rule, the City of Traverse City must offer to transfer control to Indian tribes whose aboriginal land includes the locations from which human remains were removed. In this section of the Act, aboriginal land is established through cessions (Acts of Congress, Executive Orders, and Treaties), Indian Land Claims Commission / Court of Claims decisions and other authoritative government sources. Using the resources on the National NAGPRA Program's website, Bernstein & Associates compiled a list of all of the Indian tribes whose aboriginal territory includes the counties from which the human remains included in the Con Foster Collection CUI Inventory were removed. Appendix 4 contains a list of resources.

### CUI TRIBES TO CONSULT

This worksheet is where the comprehensive list of Indian tribes and the counties for which they

have aboriginal land claims will be entered. This data will be derived from the aboriginal territory research, which can be found in the **CUI ABORIGINAL LAND RESEARCH WORKSHEET**.

## Legal Requirements

### Overview of the Act

On November 16, 1990, Public Law 101-601, the Native American Graves Protection and Repatriation Act (NAGPRA), was signed into law by President George H.W. Bush after the bill unanimously passed both houses of Congress. Con Foster Collection staff charged with implementing the Strategic Plan should read the Act (25 U.S.C. 3001 et seq.) and implementing regulations (43 CFR 10) prior to implementation of this Strategic Plan. They should also review them annually and consult them as needed. Appendix 5 includes the URL where both can be found (on the National NAGPRA Program's website).

The collections provisions (Sections 5, 6, and 7) of NAGPRA apply to all collections no matter when they were acquired. The Act also includes a land provision (Section 3), which applies to discoveries of covered items on federal and tribal land after November 16, 1990. The City of Traverse City is legally required to comply with the collections provisions because it is a "museum" as the term is defined by the Act. Section 3 of NAGPRA does not apply to the City of Traverse City.

NAGPRA is human rights law, Indian law, property law, and administrative law. NAGPRA does not establish new rights but instead extends certain rights to lineal descendants, Indian tribes and Native Hawaiian organizations.

- NAGPRA is human rights law in that it gives lineal descendants, Native Americans and Native Hawaiians the same rights over disposition of the dead, which were denied to them prior to the passage of NAGPRA. The right of disposition over the dead was first established in common law - the basis for Federal Law.
- NAGPRA is primarily codified as Indian Law (25 U.S.C 3001 et seq.) and as such it recognizes the special relationship between the United States Government (and by extension the museums that must comply with the Act) and Indian tribes.
- NAGPRA recognizes that lineal descendants, Indian tribes, and Native Hawaiian organizations must be afforded the same rights to property - personal and communally controlled property -that has been afforded to all others.
- NAGPRA is administrative law in that it establishes a process for repatriation of culturally affiliated human remains, funerary objects, sacred objects, and objects of cultural patrimony held by museums and federal agencies; as well as disposition of culturally unidentifiable human remains held by museums and federal agencies.



## Human Remains and Associated Funerary Objects

### Section 5 (25 U.S.C. 3003) & 43 CFR 10.9 - Inventories and Notices of Inventory Completion

#### *Legal Requirements*

- No later than November 16, 1995, cultural affiliation determinations were to have been made by the City of Traverse City in consultation with lineal descendants, Indian tribes and Native Hawaiian organization that may have an interest.
- No later than May 16, 1996 culturally affiliated and culturally unidentifiable human remains inventories were to have been submitted to the culturally affiliated Indian tribes and the Secretary of the Interior (at the time, these were to be addressed to the Department of the Interior Department Consulting Archeologist and now the National NAGPRA Program).
- No later than May 16, 1996, draft notices of inventory completion for culturally affiliated human remains were to have been submitted to the Secretary of the Interior (at the time, these were to be addressed to the Department of the Interior Consulting Archeologist and now the National NAGPRA Program) for publication in the *Federal Register*.

#### *Current Status*

- Human remains representing two individuals are present. This was confirmed during development of the Strategic Plan. There are no associated funerary objects present.
  - One individual is identified as “Mongoloid”. This designation is often applied to Native American remains;
  - The other is identified as a “skull of a woman found on the western plains”. Based on this provenience and the collecting patterns of Con Foster and donors to the museum, this individual is likely Native American.
- Based on interviews with former museum staff members, other human remains were most likely transferred either in the 1970s and/or just after NAGPRA was signed into law. The Grand Traverse Bay Band of Ottawa and Chippewa Indians may have taken receipt of the remains. During development of the Strategic Plan, the Tribe’s NAGPRA representative was contacted and she agreed to investigate.
- There is no evidence that the process established in 43 CFR 10.9 was followed for any of the remains.
  - The process would have resulted in the submission of a culturally affiliated and/or culturally unidentifiable human remain inventory, to the National NAGPRA Program and consulted Indian tribes. The National NAGPRA Program’s Culturally Affiliated and Culturally Unidentifiable Human Remains databases, which are maintained on the Program’s website, do not include a record for either the Con Foster Museum or the City of Traverse City;
  - Prior to transfer of control (repatriation/disposition) a Notice of Inventory Completion would have been published in the Federal Register. There have been no Notices published in the Federal Register that include a reference to the Con Foster Museum or the City of Traverse City.

*Required and Recommended Activities*

- For the two sets of human remains that are present:
  - Have a biological anthropologist examine the remains (non-invasively) to determine if there is osteological evidence to support a determination that the remains are biologically Native American; and
  - In compliance with §10.9, submit a culturally unidentifiable human remains inventory to the National NAGPRA Program. (Based on the proveniences in the database, it will be highly unlikely that the City of Traverse City will be able to make a cultural affiliation determination.)

*Applicable Excel Worksheet(s)*

**NIC PUBLICATION TRACKING TOOL**

**CULTURALLY UNIDENTIFIABLE INV**

**CUI ABORIGINAL LAND RESEARCH**

**CUI TRIBES TO CONSULT**

## 43 CFR 10.11 - Culturally Unidentifiable Human Remains and Associated Funerary Objects

### *Legal Requirements*

§10.11(the CUI Rule) was promulgated March 15, 2010. This section of the regulations implements section 8(c)(5) of the Act and applies to human remains previously determined to be Native American under §10.9, but for which no lineal descendant or culturally affiliated Indian tribe or Native Hawaiian organization has been identified. In brief, the legal requirements are:

- The City of Traverse City must initiate consultation regarding the disposition of culturally unidentifiable human remains and associated funerary objects within 90 days of receiving a request from an Indian tribe to transfer control of culturally unidentifiable human remains or if no request is received, before any offer to transfer control of culturally unidentifiable human remains.
- The City of Traverse City must offer to transfer the culturally unidentifiable human remains to the Federally Recognized Indian tribes whose aboriginal territory includes the locations from which the remains were removed.
- The City of Traverse City may offer to transfer the culturally unidentifiable human remains to non-Federally Recognized tribes with the approval of the Secretary of the Interior and if the Federally Recognized aboriginal land tribes do not object.
- Prior to disposition, a notice of inventory completion must be submitted to the National NAGPRA Program for publication in the *Federal Register*.
- Transfer of control may occur no sooner than 30 days after publication of the notice of inventory completion.

### *Current Status*

- No activities related to compliance with the CUI Rule have been undertaken.

### *Required and Recommended Activities*

- Facilitated transfer of control (disposition) under §10.11
  - Write to all of the Indian tribes whose aboriginal territory includes the western plains for the individual from that location and to all 567 Federally Recognized Indian tribes (or possibly 369 if Alaska is excluded) for the individual with no provenience in order to solicit disposition requests;
  - Prepare a presentation for a recommendation to the Secretary of the Interior for disposition and present it to the NAGPR Review Committee; and
  - Pending approval from the Secretary of the Interior and no sooner than 30 days after publication of a Notice of Inventory Completion in the Federal Register, transfer control (deaccession) and facilitated physical transfer.

### *Applicable Excel Worksheet(s)*

**NIC PUBLICATION TRACKING TOOL**

**CULTURALLY UNIDENTIFIABLE INV**

**CUI ABORIGINAL LAND RESEARCH**

**CUI TRIBES TO CONSULT**

## Sacred Objects, Objects of Cultural Patrimony, and Unassociated Funerary Objects

### Section 6 (25 U.S.C. 3004) & 43 CFR 10.8 – Summaries

#### *Legal Requirements*

No later than November 16, 1993, a NAGPRA Section 6 summary was to have been submitted to all Federally Recognized Indian tribes and Native Hawaiian organizations that may have an interest as well as to the Secretary of the Interior. (At the time, NAGPRA Section 6 summaries were to be submitted to the Department of the Interior Consulting Archeologist and now to the National NAGPRA Program.) The summary was to serve as an invitation to consult. The summary was to provide enough information about the items under the control of the City of Traverse City so that the Indian tribes and Native Hawaiian organizations could determine if there may be items covered by NAGPRA to which they may be culturally affiliated.

#### *Current Status*

- It appears that a summary was not submitted. The Summary Database maintained on the National NAGPRA Program's web site does not include an entry for the Con Foster Museum or the City of Traverse City; And former staff, including Heidi Kendziorski (curator 1995-1998. Graduate of Central Michigan University's Museum Studies program) who was believed by others to have done a "NAGPRA review" of the collection, have no recollection of any paperwork being generated.
- There is no way to know if items in the database are present. According to Dan Truckey, the current database was created from catalog cards without reconciling the data with the objects. Ms. Kendziorski said the same of the database that she inherited.

#### *Required and Recommended Activities*

- During development of the Strategic Plan, Bernstein & Associates identified several items that are (e.g. cup from a grave) or are highly likely to be (e.g. Ottawa medicine, bundles and Hupa hat) covered by Section 6 of NAGPRA. These items, as well as the bulk of the Native American cultural items, should be included in a NAGPRA Section 6 summary.
  - Prior to preparing the Summary, confirm presence of items most likely to be covered by NAGPRA (see **B&A NOTES ON PORTION OF COLL WORKSHEET**)
  - The items highlighted in orange and also possibly others if their presence can be confirmed, should be described in the summary all other items should be referred to in a general way in case specific items cannot be located.
  - Submit the summary, along with a cover letter, to Indian tribes and Native Hawaiian organizations that may be culturally affiliated with items in the collection that may be covered by the Act. (Certified mail with return receipt is recommended to ensure proof of submission.)
  - Provide a copy of the summary as well as the list of recipients to the National NAGPRA Program. (The program has converted to all electronic and therefore the submission can be made via email.)

- Requests from lineal descendants, Indian tribes, and Native Hawaiian organizations for consultation, information, or additional documentation must be addressed in a timely manner.
- Responses to requests for additional documentation and consultations should be well documented and filed in conformance with the **FILING GUIDE** (Appendix 3).
- It is recommended that the City of Traverse City receive training in NAGPRA basics with an emphasis in meaningful consultation. (Bernstein & Associates will provide this as per our agreement.)
- Initiate consultation with recipient Indian tribes and Native Hawaiian organizations. (This can be funded by a NAGPRA Consultation/Documentation grant.)

*Applicable Excel Worksheet*

**B&A NOTES ON PORTION OF COLL**

**NIR PUBLICATION TRACKING TOOL**

## Future Applicability Rule (43 CFR 10.13)

### New Indian tribe

Within 6 months of the publication in the *Federal Register* of the Native American group's placement on the list of Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs provide a Summary (items that may be sacred objects, objects of cultural patrimony, and unassociated funerary objects) of the collection to that Indian tribe.

### New holding

- Within 2 years of the publication in the Federal Register of the Native American group's placement on the list of Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs prepare, in consultation with the newly recognized culturally affiliated Indian tribe, an inventory (43 CFR 10.9).
- Within 6 months of receiving a new holding or collection or locating a previously unreported current holding or collection, the City of Traverse City must provide a summary (43 CFR 10.8) of the holding or collection to any Indian tribe or Native Hawaiian organization that is, or is likely to be, affiliated with the collection.
- Within 2 years of receiving a new holding or collection or locating a previously unreported current holding or collection, the City of Traverse City must prepare, in consultation with any affiliated Indian tribe or Native Hawaiian organization, an inventory (43 CFR 10.9).
- Additional pieces or fragments of previously repatriated human remains, funerary objects, sacred objects and objects of objects of cultural patrimony may be returned to the appropriate Indian tribe or Native Hawaiian organization without publication of a Notice in the Federal Register, as otherwise required if they do not change the number or cultural affiliation of the cultural items listed in the previous notice.

### Amendment of previous decision

Any museum or Federal agency that has previously published a notice in the Federal Register regarding the intent to repatriate unassociated funerary objects, sacred objects, and objects of objects of cultural patrimony under §10.8(f), or the completion of an inventory of Native American human remains and associated funerary objects as required by §10.9(e), must publish an amendment to that notice if, based on subsequent information, the museum or Federal agency revises its decision in a way that changes the number or cultural affiliation of the cultural items listed.

### Applicable Excel Worksheets

Any or all of the worksheets may apply.

## Repatriation/Disposition (transfer of control) - NAGPRA Section 7 (25 U.S.C. 3005) & 43 CFR 10.10

### *Current Status*

There are no deadlines for lineal descendants, Indian tribes, and Native Hawaiian organizations to submit repatriation claims, repatriation requests, or enter into disposition agreements. Upon receipt of a repatriation claim for sacred objects, objects of cultural patrimony, and unassociated funerary objects, the City of Traverse City, must determine if the claim is valid. Currently, there are no known claims.

### *Required and Recommended Activities*

#### Deadlines

Upon receipt of a valid claim, the City of Traverse City has 90-days to publish a notice in the *Federal Register*.

#### Claim Evaluation

- The claim evaluation process should **not** include a requirement for claimants to reveal specifics about ceremonies and traditional practices. Nor should final disposition of a repatriated item play a role in the evaluation process. In other words, care and handling of repatriated cultural items are to be left to the discretion of the claimant.
- It is recommended that the City of Traverse City receive training in claim evaluation (Bernstein & Associates will provide this as per our agreement.)
- It is recommended that the City of Traverse City work together with Indian tribes and Native Hawaiian organization as claims are developed.

### *Applicable Excel Worksheets*

**NIC PUBLICATION TRACKING TOOL**

**NIR PUBLICATION TRACKING TOOL**

## Repatriation/Disposition (transfer of control) – Process

Always refer to the law and the regulations for clarification. Recommendations are intended to address issues not addressed by either.

<b>Culturally Unidentifiable Human Remains &amp; Associated Funerary Objects</b> (Disposition Agreement)	<b>Culturally Affiliated Human Remains &amp; Associated Funerary Objects</b> (Repatriation Request)	<b>Sacred Objects, Objects of cultural patrimony, and Unassociated Funerary Objects</b> (Repatriation Claim)
<p><u>Must</u> offer to transfer control to Federally Recognized Indian tribes whose aboriginal land includes location from which remains were removed.</p> <p><u>May</u> offer to transfer control to Non-Federally Recognized Indian tribes or non-aboriginal land tribes if Federally Recognized Indian tribes whose aboriginal land includes location from which remains were removed do not object and with approval of the Secretary of the Interior</p> <p>Transfer control no sooner than 30 days after publication of the Notice of Inventory Completion.</p>	<p>Upon receipt of a repatriation request from any of the culturally affiliated Indian tribes, proceed with transfer of control no sooner than 30 days after publication of the Notice of Inventory Completion. (Notices were to be submitted to the National NAGPRA Program along with the culturally affiliated human remains inventories.)</p> <p>Recommendation: Inform the other culturally affiliated Indian tribes of the request and ascertain if they would like to jointly request repatriation.</p> <p>Physical transfer should be approved, in writing, by all repatriating Indian tribes when there is more than one.</p>	<p>Within 90 days of receiving a valid repatriation claim, publish a notice of intent to repatriate. (A valid request has three elements:</p> <ol style="list-style-type: none"><li>1) The party has standing (is a lineal descendant; is a Federally Recognized Indian tribe; or Native Hawaiian Organization);</li><li>2) item is covered by NAGPRA (meets one or more of the definitions of a covered item); and</li><li>3) the claimant is culturally affiliated.</li></ol> <p>4) A claimant may also wish to provide evidence that the museum does not have right of possession.</p> <p>No sooner than 30 days after the notice is published, transfer legal control.</p>



## Compliance Timeline

### Six-Year Strategic Plan Goal For full NAGPRA Compliance\*

The goal of the Strategic Plan is to be in full compliance with NAGPRA within six years. To accomplish this goal, each year beginning in 2015 and ending in 2019, the City of Traverse City will either self-fund or apply for NAGPRA Consultation/Documentation grants to work with specific groups of Indian tribes on discrete projects.

### Native American Human Remains

A culturally unidentifiable human remains inventory will be submitted to the National NAGPRA Program by December 2015. Compliance with 43 CFR 10.11, the CUI Rule, can be funded by a NAGPRA Consultation/Documentation grant. The next grant application deadline will be some time in March 2016. FY16 grant funding will not be made available to successful applicants until late summer 2016. If the City of Traverse City provides the funding, the project could be completed by late summer 2016.

### Cultural Items that May be Sacred Objects, Objects of Cultural Patrimony, or Unassociated Funerary Objects

The goal is to have the NAGPRA Section 6 summary submitted to Indian tribes that may have an interest and the National NAGPRA Program by the end of the summer of 2015.

The **GRANT TRACKING TOOL WORKSHEET** includes the following grant projects, all of which support the six-year goal.

#### FY 2016

This grant will have two goals:

1. Facilitation of disposition of human remains
2. Repatriation of items covered by NAGPRA Section 6. The objective will be to consult with local Indian tribes - as many as the budget will allow such as the
  - a) Grand Traverse Bay Band of Ottawa and Chippewa Indians
  - b) Little Traverse Bay Band of Odawa Indians

#### FY 2017

This grant will have the goal of repatriation of items covered by NAGPRA Section 6. The objective will be to consult with other Great Lakes Indian tribes to which a summary was submitted- as many as the budget will allow.

#### FY 2018

This grant will have the goal of repatriation of items covered by NAGPRA Section 6. The objective will be to consult with Sioux (Lakota, NaKota, and DaKota) Indian tribes that received a summary- as many as the budget will allow.

#### FY 2019

This grant will have the goal of repatriation of items covered by NAGPRA Section 6. The objective will be to consult with the other Indian tribes to which a summary was submitted - as many as the budget will allow.

*Applicable Excel Worksheets***TIMELINE**

\*NAGPRA does not include a deadline by which time Indian tribes must submit repatriation claims for unassociated funerary objects so there is no guarantee that all of the items covered by NAGPRA will have been repatriated within the stated timeline. Nor is there a guarantee that all of the Indian tribes that may have an interest will be available to consult. It's important to remember that a lack of response from Indian tribes does not indicate a lack of interest, but instead results from a lack of time and resources.

Figure 1 - Compliance Timeline for Human Remains

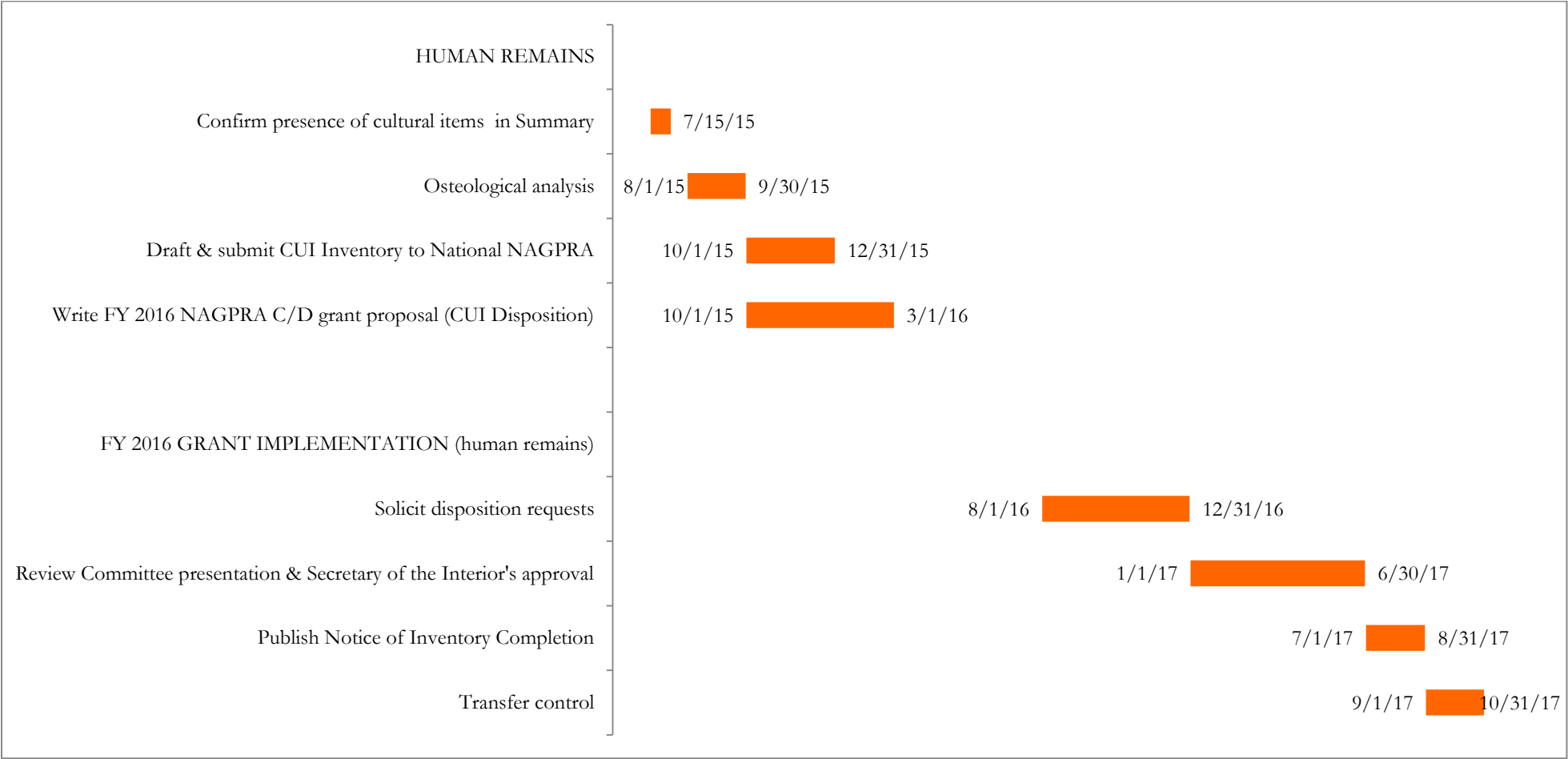
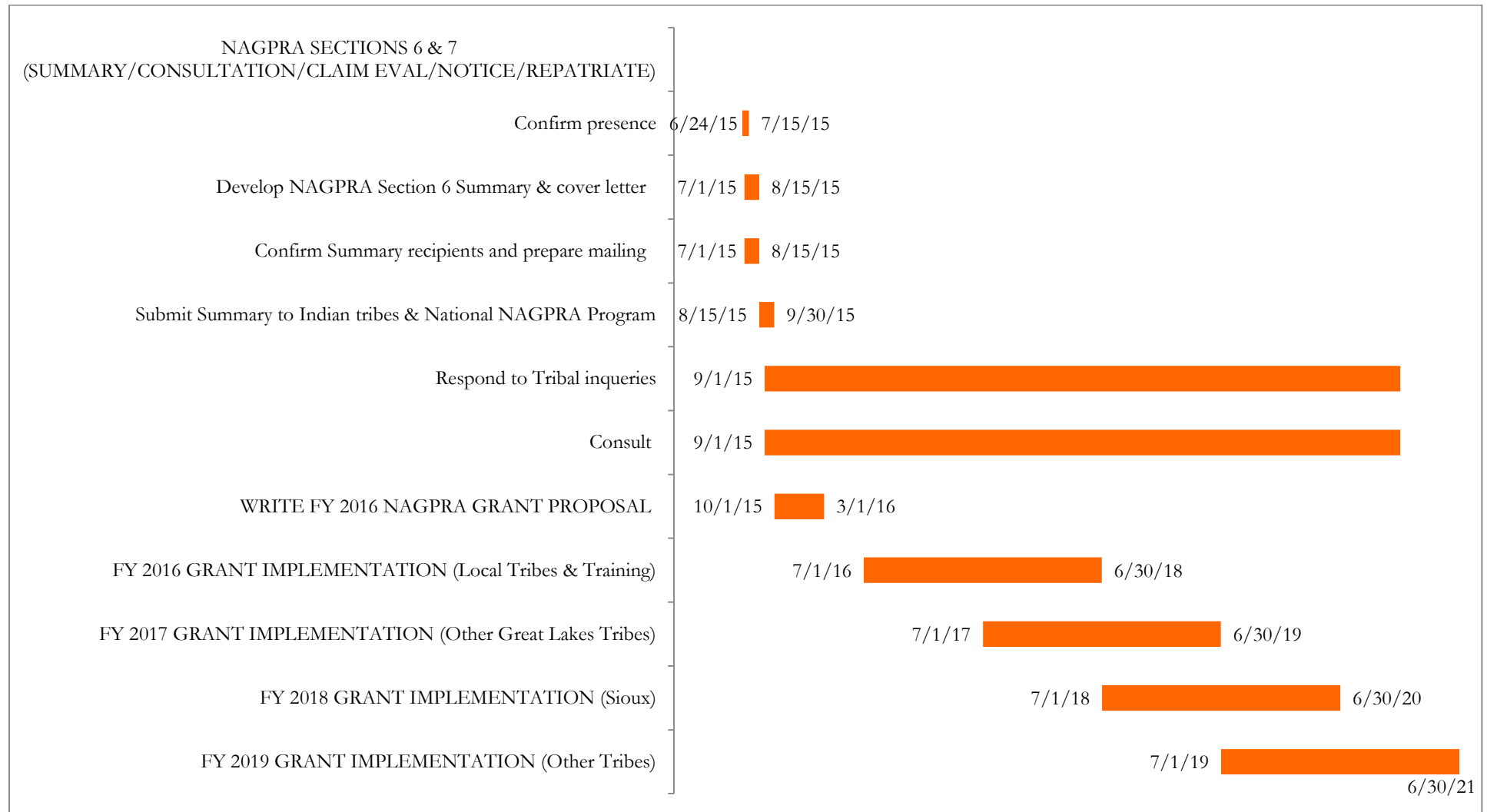


Figure 1

**Figure 2 - Compliance Timeline for Sacred Objects, Objects of Cultural Patrimony, and Unassociated Funerary Objects****Figure 2**

## Additional Activities

- Respond to tribal inquiries regarding additional collection documentation and information as well as in-person consultation. (Required)
- Write a statement about the use of pesticides. (Any known use of pesticides must be reported prior to repatriation.)
- Develop **CON FOSTER COLLECTION NAGPRA COMPLIANCE PROCEDURES** (recommended). The procedures should:
  - Formalize the process used to determine if a repatriation claim for sacred objects, objects of cultural patrimony, or an unassociated funerary object is valid;
  - Formalize the process for informing and working with a claimant whose claim is found to be invalid; and
  - Include a timeline from claim receipt to notice of intent to repatriate publication and physical transfer.
- Regularly update the **CON FOSTER COLLECTION - NAGPRA COMPLIANCE STRATEGIC PLAN.XLSX**
  - Record publication of notices of inventory completion, announcement of notice publications, transfers of control, transfers of custody, and other compliance-related events in the **NIC PUBLICATION TRACKING TOOL WORKSHEET**
  - In the **NIR PUBLICATION TRACKING TOOL WORKSHEET**, record activities related to the NAGPRA Section 6 compliance such as notice of intent to repatriate publication.
- Updated the **HISTORY OF NAGPRA COMPLIANCE** (Appendix 1)
- Regularly update the **EXECUTIVE SUMMARY** (Appendix 3)

## Consultation Recommendations

NAGPRA is an ongoing process during which long-term relationships are built with Indian tribes and Native Hawaiian organizations. Having and sharing written policies and procedures during consultation conveys a commitment to compliance and an appearance of transparency. To that end, during consultation with Indian tribes, share:

- **CON FOSTER COLLECTION NAGPRA COMPLIANCE PROCEDURES**
- **PESTICIDE STATEMENT**

## Compliance Funding

The National NAGPRA Program awards \$5,000 - \$90,000 NAGPRA Consultation/Documentation grants once a year. In recent years applications were due in early March and grant award agreements were issued in late summer. These grants are awarded on a competitive basis. No limitations are placed on the number of grant proposals that can be submitted in a given year, nor are there any limitations on the number of grants that a recipient can be awarded or have open so long as the recipient is all in good standing (up to date on reporting requirements established in grant agreements).

If each of the four NAGPRA Consultation/Documentation grant proposals detailed above is funded and each grant budget is for the maximum allowable (\$90,000), the total amount of grant funds (including indirect but excluding cost-sharing) need to implement the Strategic Plan will be \$360,000.

## More About Funding Compliance with NAGPRA Grants

### Types of Grants

There are two types of NAGPRA grants. Both are administered through the National NAGPRA Program:

1. NAGPRA Consultation/Documentation Grants

From \$5000-\$90,000 is available to museums and Indian tribes to fund NAGPRA projects (not NAGPRA programs). These grants are awarded on an annual basis (deadline in early March) and are competitive. They fund projects that support the goal of repatriation. These grants are submitted through Grants.gov

2. NAGPRA Repatriation Grants

Non-competitive grants of up to \$15,000 are available to museums and Indian tribes to cover costs associated with physical transfer and reburial. Funds are made available on a first come basis through an application process. Before a grant can be awarded, the appropriate notice must be published in the *Federal Register* and written proof of transfer of control from the museum to the tribe must be provided to the National NAGPRA Program along with a grant proposal.

### Grant Period (timeline)

Each recipient of a NAGPRA Consultation/Documentation grant enters into a grant agreement. The grant period in the agreement is always for a two year period even when the grant proposal included a shorter timeline.

### Grant Budgets

Each grant proposal may include the following line items:

- Salary & fringe benefits
- Consultant fees
- Supplies

- Transportation and Per Diem (travel)
- Other costs (e.g. delivery services, photocopying, and stipends for tribal elders)
- Indirect costs (maximum allowable is 25%)

### **Extensions & Modifications**

Awarded NAGPRA Consultation/Documentation grants can be extended for up to five years from the start date established in the grant agreement. After five years, any remaining funds are diverted to the US Treasury. In addition to extensions, requests can be submitted to the National NAGPRA Program for scope of work and budget modifications.

## Staffing Needs for Each Grant-Funded Project

The following personnel will be needed to successfully implement each this plan:

NAGPRA assistant (preferably a local person with knowledge of the collection)

Responsibilities would include:

- Photo document items if images cannot be located
- Locate and assemble associated documentation in preparation for consultations
- Coordinate tribal travel
- On-site meeting prep (room, refreshments, etc.)
- Object handling
- Note taking
- Data entry

NAGPRA consultant

- Train designated individuals in NAGPRA basics including, meaningful consultation, repatriation claim development and evaluation
- Train NAGPRA assistant
- Provide technical support throughout implementation
- Meeting facilitation
- Grant writing
- Grant interim and final report writing
- Draft **PESTICIDE STATEMENT**
- Draft **CON FOSTER COLLECTION NAGPRA COMPLIANCE PROCEDURES**

City of Traverse City Responsibilities will include:

- Participate in consultations
- Repatriation claim evaluation
- Authorization for publication of notices
- Grant financial management and reporting
- Facilitate purchases associated with consultation including travel of tribal representatives
- Deaccession and transfer control of items to be repatriated



## Appendices

## Appendix 1 – History of Compliance

### Timeline of NAGPRA Compliance for the Con Foster Collection

1990 November 16	NAGPRA signed into law
Unknown date	Possibly just after NAGPRA was signed into law, an unknown number of human remains from unknown locations are thought to have been transferred to a local tribe – possibly the Grand Traverse Bay Band of Ottawa and Chippewa
1993 November 16	NAGPRA Section 6 deadline for submitting summaries
1995 November 16	NAGPRA Section 5 deadline for making cultural affiliation determinations for human remains and associated funerary objects
1995-1998	Heidi Kendziorski, after graduating from Central Michigan University's Museum Studies program, went to work for the museum as a curator. During her tenure, volunteers enter data from catalog cards into an existing database. The data was not reconciled with the collections nor was it cleaned up. Ms. Kendziorski's spent the majority of her time researching the collections, using her personal library, in preparation for exhibit development. She does not recall that a NAGPRA summary or inventory was created. Her only recollection of working with Indian tribes is when they were shown the exhibit scripts prior to label production.
1996 May 16	NAGPRA Section 5 deadline for submitting culturally affiliated human remains inventories and draft notices of inventory completion as well as a culturally unidentifiable human remains inventory

## Appendix 2 – Filing Guide and Finding Aid

These documents were developed for the University of Colorado Museum of Natural History and may be used as a template.

# **NAGPRA Filing Guide**

## **INTRODUCTION**

This document is a reference tool for the Collection Manager or person responsible for NAGPRA administration. Use the Digital File Finding Aid and the paper file finding aids to locate documents.

The University of Colorado Museum of Natural History (UCM) is a “museum” as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) and therefore must comply with the Act and its implementing regulations. Proof of compliance with NAGPRA must be maintained in perpetuity.

This document describes the locations of the existing NAGPRA compliance documentation, both paper and electronic. It also describes how to document future NAGPRA compliance.

## **FILE TYPES: ARCHIVAL & ACTIVE**

There are two major categories of files, archival and working. Archival files are those to which no additional materials will be added. They document past activities. Active files are files to which documents will continue to be added. An example of an archival file is documentation of a set of human remains that has been repatriated and physically transferred/reinterred. One type of active file would be the set of tribal files maintained for each of the Indian tribe and Native Hawaiian Organization with which the UCM has been in contact. Open grant files are also considered to be active files, but when a grant closes the file becomes an archival file. This does not happen to tribal files, they are always active files.

## **FILE LOCATIONS**

Active and archival paper files are housed in the anthropology collections manager’s office and the UCM records room (Henderson 210). Most files are housed in 210 with the exception of files associated with the administration of open NAGPRA grants and repatriations/deaccessions, which are located in the collections manager’s office. Digital files are on the Shared drive in the NAGPRA folder.

## FILE NAMING AND ORGANIZATION

### **DO NOT RENAME OR MOVE ANY FILES AS YOU WILL DISABLE THE SHORTCUTS.**

See the [Digital File Finding Aid](#) and the [Paper Files Finding Aids](#) for how each file is organized.

It is important to keep file names consistent and brief. We have tried to standardize terms to aid in searching for files. Below are examples of the majority of file name types. Before naming any files, refer to this list and/or other files of a similar type to maintain consistency. File folder names below will appear in blue; individual file names will appear in green and will have an ending of “docx” or “pdf” but can be either. This is a general guideline. Sometimes you will need to create folders rather than an individual file for those items with more than one doc on that subject. Use the existing files to guide you.

### **Human Remains**

To the best of our knowledge all human remains under the control of the museum have been repatriated. No new files should need to be made. If any new remains are located, use the human remains file folders as a guide for how to create new files.

HR file name is state abbreviation followed by the county, site, or description

#### Consultation

ConsultationPacket  
ConsultMinutes.docx  
ConsultLog.docx  
ConsultInitiationLetter.docx  
ConsultInitiationLabels.docx  
ActionItemsPostConsultation

#### Correspondence

YYYY.MM.DD (add extra descriptor if needed/justified, e.g. Tribe/Agency).pdf

#### DispositionSupportLetters

Reburial

#### Correspondence

YYYY.MM.DD (add extra descriptor if needed/justified, e.g.  
Tribe/Agency).pdf

InventoryPrep

Grants

#### InventorySiteName.pdf

NIC/NIR SiteName.pdf

NIR/NICAnnouncementSiteName.docx

NIR/NICMailLabels.docx

SampleRepatRequest.docx

CUI (All) InvDistribution&DispSolicitation.docx

RepatReqReceiptAnnounce.docx

## Grant Files

GrantNumber – YYYYGrant - Description

Application

OCG Forms

WorkingDocs

ApplicationYYYYConsult(or Repat) .docx

ResumeLastName

CommitLetterB&A

CommitQualsB&A

CommitVerbal

CoverSheet

SupportDoc-shortname (eg XferContrlLetter)

SF424

AwardAnnouncement

Consultation

ConsultationPacket

BinderInfo

ActionItemsPostConsultation

Financial

YYYY.MM.DD Travel

Reports

Name mods, reports, sf-425s starting with “interim report”, “modification”, etc then date, for SFs do “interim report, date, sf425” – the date is the end of the reporting period NOT the submittal date. Enter dates yyyy.mm.dd

Final reports don’t get dates, just date the mods, exts and interims.

Final Report

FinalReport.docx

FinalBudgetConfirmyyyy.mm.dd.docx

Modifications&Extensions

ModificationReqyyyy.mm.dd.docx

ModificationAppryyyy.mm.dd.docx

ExtensionReqyyyy.mm.dd.docx

ExtensionAppryyyy.mm.dd.docx

Grant Agreement.docx

## **Tribal Files**

### Consultations

YYYY.MM.DD

ConsultAgenda.docx

ConsultMinutes

ConsultNotes

ConsultInitiationLetter.docx

ConsultationPacket

ActionItemsPostConsultation

PostConsultLetterYYYY.MM.DD.docx

ConsultationPrep

### Correspondence

YYYY.MM.DDInquiry.docx

YYYY.MM.DDInquiryResp.docx

### Grants

HumanRemains&FOConsults

Repatriations&Dispositions

SummaryTribename

Summary1993.docx

SummaryLetterYYYY.MM.DD.docx

## **Deaccession Files (Shared/Accessions&Deaccessions/Deaccessions)**

DYYYY-##ObjectTypeTribe

DeaccessYYYY-##ObjectTypeTribe.docx

NIR.docx

RepatriationRequest.docx

TransferOfCustody DD.MM.YYYY.docx

RepatriatedObjectList.docx

Inventory - Location.docx

DispositionAgreementTribe.docx

## ACTIVITIES

### GRANTS

When you receive a grant and are actively working on the project, you will have a working file open. After the grant has closed, have one person reconcile draft and final documents and file the paperwork in accordance with the following:

**Paper:** Create the following dividers and file docs with the most recent in the front.

- Section 1* Communication with National Native American Graves Protection and Repatriation Act and the National Park Service
- Section 2* Internal Communication
- Section 3* Internal Financial Documents
- Section 4* Correspondence with Tribes
- Section 5* Additional File Specific Material
- Section 6* Proposal

**Digital:** Create the following folders and file.

- Application
- AwardAnnouncement
- Financial
- Modifications OR Modification&Extensions
- Reports

Grant agreement and award letter docs should be filed in the main grant file folder, rather than in any subfolder.

### HUMAN REMAINS

For human remains physical transfers see the Repatriations & Deaccessions section below.

**Paper:** Create the following dividers and file docs with the most recent in the front.

- Section 1 (when applicable)* Reinterment
- Section 2* Repatriation Request
  - Deaccession / Repatriation / Transfer of Control
  - Transfer of Custody
- Section 3* Inventory
  - Notice of Inventory Completion
  - Notice of Inventory Publication Announcement and Distribution List
- Section 4* Consultation
- Section 5* Inventory Preparation

### REPATRIATIONS & DEACCESSIONS

**Paper:** When a repatriation claim is received, the original will be filed in the Deaccession paper file, with copies filed in the Tribe's file. When a Notice of Intent to Repatriate is published, a copy is printed and filed in the binder in the archive room and an electronic copy is saved in the deaccession folder.

A paper deaccession folder is also created and the *original*, signed copies of each of these documents should be filed here.



**Digital:** When an item is repatriated and deaccessioned from the collection, see the naming convention list above for the digital docs that must be saved in the deaccession folder. Shortcuts must then be made to NAGPRA folders per the Shortcut map, Appendix 1 of the Finding Aid.

**Files to Update:** When any deaccessions occur be sure to update the [Compliance Executive Summary](#).

*Human Remains:* When human remains are going through the deaccession and transfer process, there are two files that need to be updated.

NAGPRA/2-Compliance Master Files & History/2-HR & FO (NAGPRA Section 5

[Human Remains](#) database

[NAGPRA Compliance Status – Human Remains & Funerary Objects](#)

*Cultural Items:* When cultural items are going through the deaccession and transfer process, there is one document to update.

NAGPRA/2-Compliance Master Files & History/3-Sacred & CultPat & UFO (NAGPRA Section 6)

[Repatriated Cultural Items](#) spreadsheet

## TRIBAL COMMUNICATION & CONSULTATIONS

**Paper:** For all documents in the paper files, file with the most recent documents in the front of the tribe's folder. The reference tool (dated January 26, 2012) should be filed chronologically, with any items dated after the tool being filed in front of it.

*Informal Communication:*

When you receive an email or letter, place a copy in both the tribe's paper file and their digital file, under Correspondence.

*Consultation:*

**Paper:** Copies of meeting minutes from consultations with individual tribes are filed in that tribe's file. Meeting minutes from group consultations are copied and placed in each tribe's file.

**Digital:** When we have individual consultations with a tribe, digital meeting minutes are filed in the Consultation folder in that tribe's folder. However, when there are consortium consultations, the digital meeting minutes are stored in a group folder in the tribal files. An example of this is WI and Arizona O'odham. They will remain grouped as we only ever consulted with them as a group. There will be an individual tribal file for those tribes within the groups and you will need to create a shortcut back to the group file. If you have a new grant that is going to involve group consultations about human remains AND cultural items, meeting minutes are filed in the grant files. Shortcuts for each of these cases should be made per the Shortcut Map, Appendix 1 of the Finding Aid.

**Files to Update:** When any consultations occur be sure to update the [Compliance Executive Summary](#).

# Digital File Finding Aid

## Intro

NOTE: Digital files are not the most complete files. Always reference paper files in the archives as well. NAGPRA files are comprised of digital files and paper files together.

This guide explains the nature and location of files pertaining to NAGPRA compliance and related activities. These files also include a few non-NAGPRA documents that relate to the Museum's relationships and activities with tribes, other human remains that are non-NAGPRA, and requests from non-NAGPRA entities that are similar in nature to NAGPRA issues.

When beginning to use NAGPRA files, you want to start with the [master files](#). For human remains, that means the [Human Remains](#) database and the [NAGPRA Compliance Status HR&FO](#) document. For sacred items and cultural patrimony, see the [Repatriated Cultural Items](#) spreadsheet. Files concerning items that are sacred objects, cultural patrimony and unassociated funerary objects (with the exception of Ancestral Puebloan unassociated funerary objects – see below) can be found in [Tribal Files](#).

Under NAGPRA there are two categories of funerary objects: Unassociated and Associated. Associated funerary objects are contained in the human remains inventories, whereas unassociated funerary objects were to be included in summaries. In the case of Ancestral Puebloan funerary objects (repatriated 2007 & 2008), those records are contained within the human remains digital and paper files due to the nature of consultation.

## Folders and Files

**DO NOT RENAME OR MOVE ANY FILES AS YOU WILL DISABLE THE SHORTCUTS.**

### 1-READ ME

Clearly you already know what is in this folder, as you are reading the main document within it.

### 2-Compliance Master Files & History

Contents include:

- History of Compliance
- HR&FO (NAGPRA Section 5) – the spreadsheet needs to be updated periodically
- Sacred & Cultural Patrimony & UFO (NAGPRA Section 6) – needs to be updated periodically
- File Guides
- Compliance Executive Summary – needs to be updated periodically
- Future Projects for NAGPRA Compliance
- Grant Tracking – needs to be updated periodically

## **Correspondence**

Here you will find correspondence with National NAGPRA, the Colorado Commission on Indian Affairs and History Colorado (formerly Colorado Historical Society).

## **Federal Collections NAGPRA**

Here you will find NAGPRA documents related to human remains and cultural items under federal control. These are organized by federal agency.

## **Human Remains**

Human remains under the control of the Museum are located in files in the [UCM Human Remains](#) folder and are organized primarily by geographic location, but occasionally by culture as in the case of Ancestral Puebloan and Arikara. If you want to see all of the notices of inventory completion, go to the NAGPRA Compliance Status HR&FO spreadsheet for hotlinks or the binder in the archives room.

## **NAGPRA Grants**

This folder is divided into Consultation Grants and Repatriation Grants. The folders are organized by grant number and year.

## **Non-US NAGPRA-like Requests**

Here you will find requests that relate to human remains or sacred objects from groups outside the U.S.

## **ResourcesForConsultations**

Contained in this folder you will find logistical information for bringing people to the Museum.

## **Training Materials&Resources**

Here you will find webinars from National NAGPRA and things like policies related to human remains from other institutions.

## **Tribal Files**

Every Indian tribe and Native Hawaiian organization we have ever had contact with (both federally recognized and non-federally recognized) has a folder here. All folders are named in accordance with the official [BIA Tribal Entities List](#). More common names are occasionally found in parentheses following the official name. A spreadsheet cross referencing federally recognized Indian tribes to cultures can be found [here](#). There is no one list of Native Hawaiian organizations. For the current list, go to the National NAGPRA program's website where you can find a link.

Files concerning items that are sacred objects, cultural patrimony and unassociated funerary objects (with the exception of Ancestral Puebloan unassociated funerary objects— see above) can be found here as well.

The lower 48 tribes are contained within the main file. There is a subfolder for Alaska and one for Hawaii.

## Shortcuts

### **DO NOT RENAME OR MOVE ANY FILES AS YOU WILL DISABLE THE SHORTCUTS.**

Shortcuts exist to avoid duplication of files in multiple file folders. When you click on a shortcut, it is taking you to a different folder. To get back to where you were, simply click the back button, rather than a folder name in the navigation bar. For a map of the shortcuts see Appendix 1 of this document.

## How to Initiate a Project

*Example 1:* How do I know what's been done with a certain tribe?

Shared -> NAGPRA -> Tribal Files -> Federally Recognized Tribe Name

Note: For intertribal consultations where multiple tribes participated, meeting minutes will reside in the grants folder, shortcuts to which can be found in the tribal files.

Note: To know what was sent to all of the Paiute tribes, for example, oftentimes the federally recognized name does not include "Paiute". To get a list of all tribes from a certain culture group, see

[1 - Culture-TribeCrossRef.](#)

*Example 2:* How do I know which human remains are still present at UCM and which have been physically transferred?

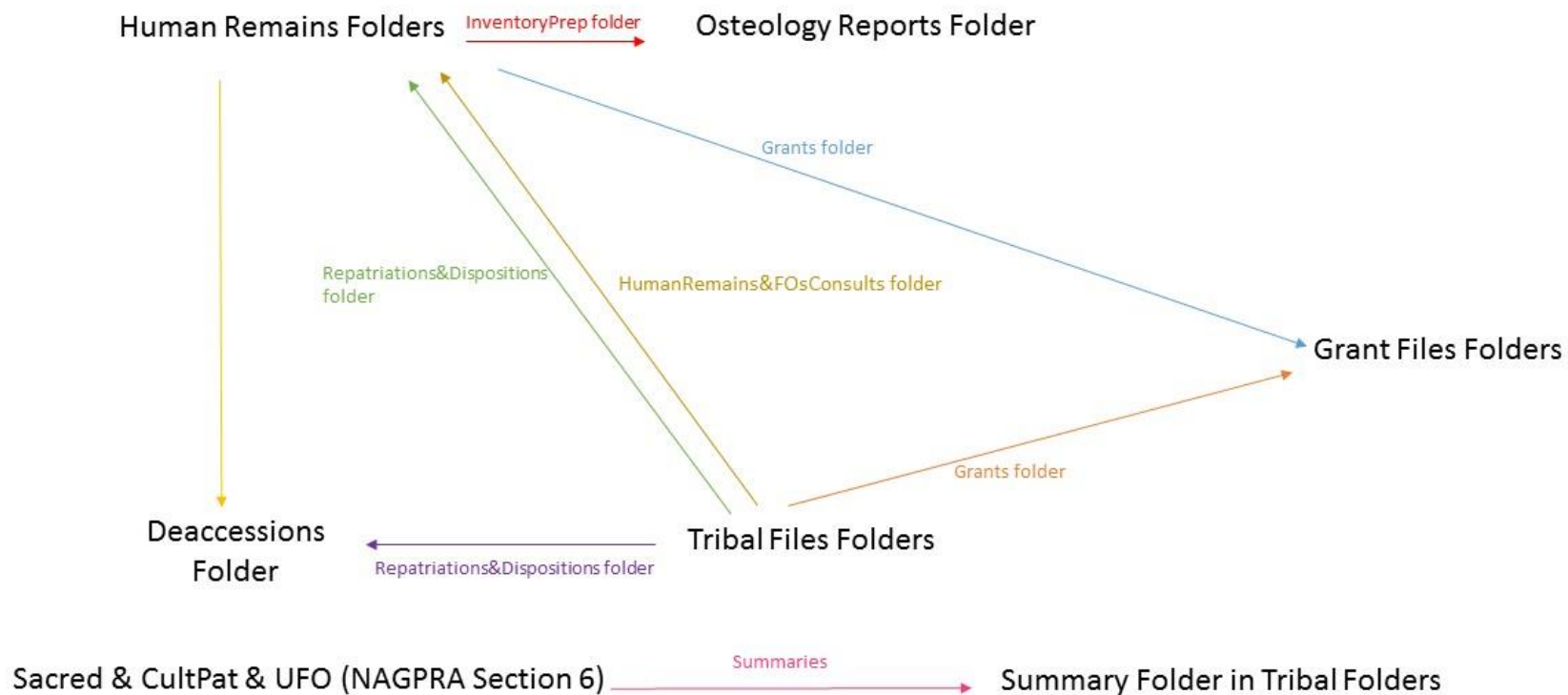
Shared -> NAGPRA -> 2 – Compliance Master Files & History -> 2 – HR & FO (NAGPRA Section 5) -> EITHER Human Remains Access database file OR NAGPRA Compliance Status – Human Remains & Funerary Objects

## Abbreviations

AFO	Associated Funerary Objects
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
CCIA	Colorado Commission on Indian Affairs
Co	County
Conf	Confederated
CRM	Cultural Resources Management
CUI	Culturally Unidentifiable Inventory (Individual)
Dyear-##	Deaccession
FO	Funerary Objects
Ft	Fort
H&S	Hohokam and Salado
HR	Human Remains
MHA Tribes)	Mandan, Hidatsa, & Arikara (Three Affiliated
NA	Native American
NFS	National Forest Service
NIC	Notice of Inventory Completion
NIR	Notice of Intent to Repatriate
NPS	National Park Service
St	Saint
UCM (UCMNH)	University of Colorado Museum of Natural History
UFO	Unassociated Funerary Objects

## NAGPRA Digital File Shortcuts Map

NOTE: DO NOT change any file names or relocate any files as shortcuts will be broken.



Shared/NAGPRA/READ ME/Templates

### Appendix 3 – Executive Summary

This document should be regularly updated so it can be used as a quick reference tool.

## **EXECUTIVE SUMMARY**

### **FUNDING**

(List grants)

### **NAGPRA SECTION 5 (human remains and associated funerary objects)**

(Number of Indian tribes contacted and consulted)

(List Notices of Inventory Completion published)

(List minimum number of individuals and number of associated funerary objects - identify how many of them have been and have yet to be repatriated (transfer of control) & physically transferred for reburial)

### **NAGPRA SECTION 6 (sacred objects, cultural patrimony, and unassociated funerary Objects)**

(List number of Indian tribes to which a summary was submitted)

(List number of Indian tribes consulted)

(List Notices of Intent to Repatriate published and number of items repatriated)

\*For a comprehensive overview of compliance, refer to the  
**CON FOSTER COLLECTION - NAGPRA COMPLIANCE STRATEGIC PLAN.XLSX.**



## Appendix 4 – 43 CFR 10.11 Compliance Resources

For the human remains, the following resources should be used to identify all of the Indian tribes that should be contacted.

- Native American Consultation Database (search by Tribe or County)  
<http://grants.cr.nps.gov/nacd/index.cfm>
- Indian Land Cessions (select state and then locate county)  
[http://www.nps.gov/nagpra/ONLINEDB/Land\\_Cessions/INDEX.HTM](http://www.nps.gov/nagpra/ONLINEDB/Land_Cessions/INDEX.HTM)
- Indian Land Areas Judicially Established 1978 (Indian Land Claim's Commission Decisions)
- Map <http://www.nps.gov/nagpra/DOCUMENTS/ClaimsMAP.htm>
- Index <http://www.nps.gov/nagpra/DOCUMENTS/ClaimsMapIndex.htm>
- Bernstein & Associates' Tribal Contact database

## Appendix 5 - Additional Resources

National NAGPRA Program web site <http://www.nps.gov/nagpra/>  
Check this web site regularly. Posted on the site you will find:

- Review Committee meeting dates, locations, agendas
- Reports (GAO and others)
- Findings of the Solicitor's Office, which clarify interpretation of the Act
- Announcement about trainings including webinars
- The law (25 U.S.C. 3003 et seq.) and implementing regulations (43 CFR 10)
- Databases (Summaries, Inventories, Notices, Consultation)
- Notice templates
- Information for grant applicants and recipients

Resources for the identification of Indian tribes (including Alaskan Native villages) and Native Hawaiian organization with standing under NAGPRA

- BIA list of tribes  
<http://www.bia.gov/idc/groups/xraca/documents/text/idc011463.pdf>
- BIA Tribal Leaders Directory  
<http://www.bia.gov/WhoWeAre/BIA/OIS/TribalGovernmentServices/TribalDirectory/index.htm>
- Bernstein & Associates Consultation Database is available for a fee to create personalized correspondence

This Page Intentionally Left Blank